

To: Wyckoff Site File  
From: Helen Bottcher, RPM

Re: **Notes from May 23, 2016 meeting with the Suquamish Tribe**

The Suquamish Tribe requested a meeting during the public comment period on the April 2016 *Proposed Plan for Amending the Records of Decision for the Wyckoff/Eagle Harbor Superfund Site, (Operable Units 1, 2, and 4)*.

The meeting was held at EPA's Seattle Office, from 10:00 am to Noon in the first floor "Huckleberry" conference room. Participants included:

Helen Bottcher, EPA RPM  
Beth Sheldrake, EPA Unit Manager  
Rich Brooks, Suquamish Tribe, Fisheries Program  
Denice Taylor, Suquamish Tribe, Risk Assessor

The Tribe requested the meeting because they were unhappy with the risk assessment calculations performed in support of the Proposed Plan. They noted some errors in the draft, but did not have enough time to get comments to EPA before the document was finalized and cited in the Proposed Plan. The purpose of the meeting was to discuss the Tribe's specific concerns, and the process moving forward.

Rich Brooks asked to see a draft of the ROD Amendment and the Responsiveness Summary before the documents are finalized. Beth Sheldrake said that EPA doesn't negotiate agency decisions, but that we do communicate and that Tribal acceptance, along with State concurrence, is one of the criteria the agency considers when making final cleanup decisions in RODS (in this case, ROD Amendment). EPA agreed to provide the Tribe with an opportunity to review the draft language of the ROD Amendment, with sufficient time for the Tribe to decide whether they want to request Government to Government consultation.

The Tribe's specific comments on the risk assessment included:

- The document needs to explain the 2 exposure scenarios (recreational, tribal) more clearly – recreational, tribal and boots/no boots scenarios need to be presented separately.
- The table in the risk assessment spread sheet is confusing because it lists exposure factors not used in the assessment. For clarity, the values used should be highlighted, or the values not used deleted.
- There are a few discrepancies between the text and tables that need to be cleaned up / resolved. I noted these in the margins of the document, to fix following the meeting.
- The document needs to include the total risk from sediment exposure and shellfish ingestion.
- Frequency for tribal shellfish consumption should be 365 days/year. Tribal members freeze and can shellfish, so they can eat it daily, even when beaches are closed to harvest.

EPA agreed to correct the errors identified by the Tribe, and to provide the Tribe with an updated / corrected version of the risk memo before issuing the RODA.

Rich Brooks asked about the intertidal beach, and the specific ICs that EPA plans to use to protect it. He reminded EPA that the EBS was constructed on top of what was originally habitat mitigation, built to compensate for fill caused by the 2001 construction of the perimeter sheet pile wall. EPA agreed to identify the mitigation area in the ROD Amendment.